

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

OSAMA ABU IRSHAID,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No. 1:17cv402
)	
UNITED STATES CITIZENSHIP)	
& IMMIGRATION SERVICES, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DEFENDANTS’ CONSENT MOTION FOR AN ENLARGEMENT OF TIME

Pursuant to Federal Rule of Civil Procedure 6(b), defendants, through their undersigned counsel, hereby respectfully move – with plaintiff’s consent – for an enlargement of time within which to respond to plaintiff’s complaint in the above-captioned action. The grounds for this motion are as follows:

1. In the instant action, plaintiff seeks judicial review, pursuant to 8 U.S.C. § 1421(c), of United States Citizenship and Immigration Services’ decision to deny his application to become a naturalized citizen of the United States. USCIS concluded that plaintiff was ineligible for naturalization primarily because in applying for permanent residence in the United States, he failed to disclose his affiliation with a group known as the “Islamic Association for Palestine,” and thus had not been “lawfully admitted to permanent residence in accordance with all applicable provisions of [the Immigration and Nationality] Act.” *Complaint* (Dkt. No. 1), ¶¶36-38.

2. Plaintiff served a copy of the summons and complaint in this action via hand delivery on the United States Attorney’s Office for this district on April 11, 2017 (Dkt. No. 4); as

such, defendants are currently required to answer or otherwise respond to the complaint by June 12, 2017. *See* FED. R. CIV. P. 12(a)(2).

3. The record of administrative proceedings that preceded this action is lengthy. For this reason, and because of significant other litigative and administrative responsibilities on the part of undersigned counsel (including, *inter alia*, briefing in *Chao v. Sessions*, No. 17-1173 (4th Cir.) and *Hoyle v. Sessions*, No. 1:16cv1336 (E.D. Va.), and supervisory responsibilities in *Kitlinski v. Sessions*, No. 1:16cv60 (E.D. Va.)), defendants respectfully request a two-week enlargement of time – or until June 26, 2017 – to answer or otherwise respond to plaintiff’s complaint.

4. Plaintiff's counsel has indicated that plaintiff consents to the relief sought through this motion.

5. A proposed order has been attached for this Court's convenience.

Respectfully submitted,

DANA J. BOENTE
United States Attorney

By: /s/
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DATE: June 12, 2017

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will transmit a true and correct copy of the same to the following:

Ashraf Nubani
AWN Point Law PLLC
2677 Prosperity Avenue, Suite 320
Fairfax, Virginia 22031
Email: awn@awnpointlaw.com

Date: June 12, 2017

/s/_____
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